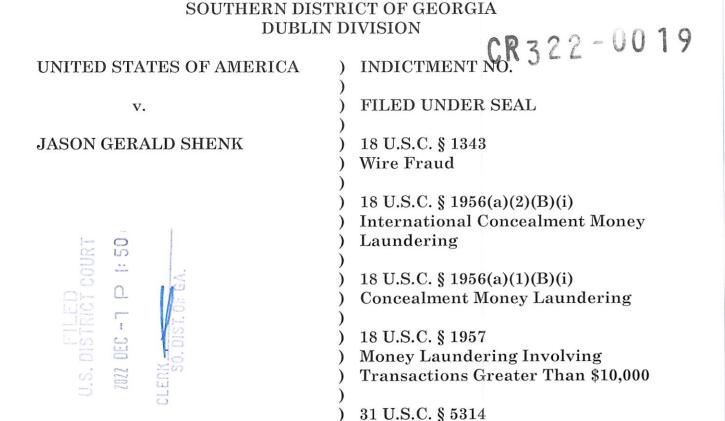
UNITED STATES DISTRICT COURT



PENALTY CERTIFICATION

The undersigned Assistant United States Attorney hereby certifies that the maximum penalties for the offenses charged in the Indictment are as follows:

Counts 1-4: Wire Fraud

18 U.S.C. § 1343

- Not more than 20 years of imprisonment
- Not more than the greater of \$250,000 fine or twice the gross loss

Bank Account

Failure to File Report of Foreign

- Not more than 3 years of supervised release
- \$100 special assessment

Counts 5-7: International Concealment Money Laundering

18 U.S.C. § 1956(a)(2)(B)(i)

Not more than 20 years of imprisonment

- Not more than the greater of \$500,000 or twice the value of the property involved in the transaction
- Not more than 3 years of supervised release
- \$100 special assessment

Count 8-15:

Concealment Money Laundering

18 U.S.C. § 1956(a)(1)(B)(i)

- Not more than 20 years of imprisonment
- Not more than the greater of \$500,000 or twice the value of the property involved in the transaction
- Not more than 3 years of supervised release
- \$100 special assessment

Counts 16-36:

Money Laundering Involving Transactions Greater Than \$10,000

18 U.S.C. § 1957

- Not more than 10 years of imprisonment
- Not more than the greater of \$250,000 fine or twice the amount of the criminally derived property
- Not more than 3 years of supervised release
- \$100 special assessment

Counts 37:

Failure to File Report of Foreign Bank Account 31 U.S.C. § 5314, 5322

- Not more than 5 years of imprisonment
- Note more than a \$250,000 fine
- Not more than 3 years of supervised release
- \$100 special assessment

If the willful violation occurs while defendant is violating another law of the United States or as part of a pattern of any illegal activity involving more than \$100,000 in a 12-month period, then:

- Not more than 10 years of imprisonment
- Not more than a \$500,000 fine
- Not more than 3 years of supervised release
- \$100 special assessment

Respectfully submitted,

DAVID H. ESTES UNITED STATES ATTORNEY

Matthew A. Josephson

Assistant United States Attorney

Georgia Bar No. 367216